

REMARKS

Claims 1, 2, 3, 4, 5, and 6 were pending in the application at the time of examination. Claims 1, 2, 3, 4, 5, and 6 stand rejected under 35 U.S.C. 103(a) as unpatentable over U.S. Patent No. 6,092,196 to Reiche (hereinafter, Reiche) in view of U.S. Patent No. 6,970,904 to Rode (hereinafter, Rode).

A review of the drawings indicated that Fig. 12 includes two instances of reference numeral 1240; Fig. 17 includes two instances of reference numeral 1720; and Fig. 24 includes two instances of reference numeral 2420. Applicants have amended the specification so that the "end with failure" element in Fig. 12 has reference numeral 1245; "user data 10" element in Fig. 17 has reference numeral 1721; and "user data 10" element in Fig. 24 has reference numeral 2421. These amendments add clarity by giving each distinct element in the drawings a distinct reference numeral and so do not add new matter. Applicants are obtaining corrected drawings and will submit replacement sheets under separate cover when the corrected drawings are received.

Claim 1 stands rejected 5 U.S.C. 103(a) as unpatentable over U.S. Patent No. 6,092,196 to Reiche (hereinafter, Reiche) in view of U.S. Patent No. 6,970,904 to Rode (hereinafter, Rode). Applicants respectfully traverse the obviousness rejection of Claim 1.

To establish a *prima facie* case of obviousness, the MPEP directs:

ESTABLISHING A PRIMA FACIE CASE OF OBVIOUSNESS

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a

reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant's disclosure.

MPEP, § 2143, 8th Ed., Rev. 3, p. 2100-135 (August 2005).

Claim 1 recites in part:

receiving a resource request, said resource request including a rights key credential, said rights key credential comprising:
at least one key to provide access to a resource on said data communications network;
and
a resource identifier, said resource identifier comprising a resource server peer group ID and a randomized user ID, said resource server peer group ID identifying a resource server peer group, said resource server peer group comprising at least one server that maintains a mapping between said randomized user ID and said at least one key, wherein said randomized user ID is associated with an identity of a user thereby protecting said identity;

Thus, Claim 1 expressly recited that the resource request includes a rights key credential and then that the rights key credential includes at least one key and a resource identifier. Claim 1 then further identifies the resource identifier. Accordingly, to suggest Applicants' invention, Reiche must suggest such a rights key credential that includes each of these elements. Applicants respectfully note that the rejection based upon Reiche has been traversed multiple times and yet no clarification has been provided on what in Reiche is considered to correspond to each element of Claim 1 and attempts to set up an Examiner interview to clarify the issues have been unsuccessful. Thus, Applicants will attempt to

correlate the rejection with elements in the claim and further demonstrate that the obviousness rejection is not well founded.

The rejection cited:

receiving a resource request, said resource request including a rights key credential (Column 9, lines 38-42),

Applicants note that this is a quotation of Applicants' claim language and then a cite to the reference. This part of Claim 1 identifies two elements, "a resource request" and "a rights key credential." Accordingly, the cited section of Reiche must suggest both of these elements. Col. 9, lines 38 to 42 of Reiche state:

The browser reconnects to the authentication HTTP server 118 supplying the authentication information. Contrary to the previous request (step 218), the client browser now sends the proper HTTP header to the authentication HTTP server 118, compares, at step 224, the authentication

The only things that can be inferred as being received in this section are "the proper HTTP header" and "the authentication information" that are both sent to the authentication HTTP server. The authentication information is described as entered by the user and includes "user ID, password, and any other authentication data." Reiche, Col. 9, lines 27 to 30. Accordingly, the authentication information does not read on a resource request.

Apparently, the rejection considers "the proper HTTP header" to be the resource request. However, the rejection fails to identify, what is considered to be either "a resource request" or "a rights key credential," in this section.

The authentication information does not include anything that can be interpreted as "at least one key" and a "resource identifier." Accordingly, the authentication information does not suggest "a rights key credential." Therefore, the

rejection must establish that the "proper HTTP header" has the features recited in Claim 1 as included in the rights key credential. As best it is understood, the rejection may be interpreting Reiche such that "the proper HTTP header" is passed "a special URL." as a parameter. Accordingly, apparently, the rejection is interpreting "the proper HTTP header" as the resource request and the special URL as reading on "a rights key credential."

Assuming that this is the basis for the rejection, to suggest Applicants' invention, the special URL must suggest each of the elements recited in Claim 1 as being included in the rights key credential. The rejection next stated:

...at least one key to provide access to a resource on said data communications network (column 9, lines 3-5);

Again, this is simply Applicants' claim language and a cite with no indication of what in this cite is considered to be the "at least one key." In context, Col. 9, lines 3-5 recite:

At step 212, **a special URL is constructed** from the row ID, client ID, transaction ID and a checksum of these three values. This information is then encrypted using a simple private key encryption algorithm, uencoded and URL encoded to facilitate transmission (step 214) (emphasis added).

Reiche, col. 9, lines 1 to 6. There is no teaching in this section of Reiche of any element that is "at least one key to provide access to a resource on said data communication network. The only key mentioned is "a simple private key encryption algorithm." Such a key suggests or teaches nothing about a key that provides access to a resource.

The special URL of Reiche further taught away from the at least one key of Claim 1 on a specific level. Reiche carefully

explained that the special URL is constructed from the row ID, client ID, transaction ID and a checksum of these three values. None of these elements taught anything about providing access to a resource. Each of these elements and a combination of the elements provide a function different from providing access to a resource. For example, a row ID identifies a row of a memory table, Reiche, col. 8, line 67. One skilled in the art will recognize that a client ID identifies a client. Reiche explicitly defined the transaction ID as uniquely identifying the session with the user. One skilled in the art will recognize that a checksum provides a redundancy check to protect the integrity of data; thus, the checksum of the special URL provides a redundancy check for the remaining elements of the special URL.

The Office Action failed to provide any rationale on how this section of Reiche provides any teaching, suggestion, or disclosure of the at least one key to provide access to a resource on said data communications network, as recited in Claim 1. Therefore, the Office Action failed to show how the cited references, alone or in combination, taught or suggested all of the claim limitations of Claim 1. Therefore, in view of the above quoted requirements from the MPEP, a prima facie obviousness rejection has not been made. This alone is sufficient for the withdrawal of the obviousness rejection of Claim 1. If the Examiner continues the rejection, the Examiner is respectfully requested to cite with specificity what in Reiche is considered to be "a rights key credential" and what is considered to be "at least one key."

The rejection becomes more confused, because it becomes circular. In the rejection of Claim 1 further stated:

...and a resource identifier (Column 9, lines 45-46), said resource identifier comprising a resource server peer group ID and a user ID (Column 8, lines 65-66),

Recall, that in Claim 1, the resource identifier is included in rights key credential that in turn was included in the received resource request. Col. 9, lines 45 and 46 of Reiche actually taught:

-program (step 228) and executes it. The AD CGI decodes the passed **special URL** (step 230), allocates a row in the (emphasis added) -

The only thing mentioned in the section is the special URL. However, the special URL cannot be both the rights key credential and the resource identifier. Accordingly, as previously pointed out, the rejection is not well founded. If the special URL is not the rights key credential, the rejection is without foundation, and if it is the rights key credential, then the whole special URL cannot be the resource identifier, because the rejection becomes circular, as stated above. The rejection has cited no basis for considering the special URL to be two different things.

Moreover, the rejection reduces the explicit claim limitations to a gist.

Authentication Daemon 124 will generate a unique 4 byte client ID and a 16 byte **random transaction ID** and store them (emphasis added) -

Reiche, col. 9, col. 8, lines 65 to 66. Apparently, the user ID is taken to read on Client ID and so the 16 byte random transaction ID is taken as suggesting "a resource server peer group transaction ID." This is error for multiple reasons. First, Reiche describes a user ID. See Col. 9, line 29. Therefore, Reiche distinguishes between user ID and client ID. To change and redefine terms as apparently was done in the rejection is clear evidence that Reiche has not been considered as a whole as required in an obviousness rejection.

With respect to the random transaction ID of Reiche, Reiche explicitly taught a transaction ID that uniquely

identifies the session with the user. This taught nothing about a resource server peer group ID, as recited in Claim 1. The Office Action failed to cite any teaching, suggestion, or disclosure for a resource server peer group ID of Claim 1. Therefore, Office Action failed to show how the cited references, alone or in combination, taught or suggested the resource server peer group ID of Claim 1. This, too, is sufficient for withdrawal of the obviousness rejection of Claim 1.

The Office Action further stated:

Reiche does not explicitly indicate that the user ID is a randomized user ID.

Rode teaches a system for controlling access to system resources (Abstract) that includes a unique identifier for the user as taught in Reiche, but further teaches that the identifier can be a uniformly chosen random number (Column 2, lines 45-54).

The motivation for this modification was given as "to allow an identifier to be chosen without contain [Sic] any personal information about the user, allowing the system to keep the user anonymous. However, with respect to the client ID, Reiche, as quoted above, taught "Authentication Daemon 124 will generate a unique 4 byte client ID." Accordingly, the client ID of Reiche does not contain any personal information about the user and so Reiche provided the very feature cited as the motivation for modifying Reiche. Again, when Reiche is considered as a whole Reiche teaches that the motivation for the combination of references is not well founded.

For each of the foregoing reasons, the prior art reference (or references when combined) failed to teach or suggest all the claim limitations; therefore, a *prima facie* obviousness rejection has not been made. If the rejection is continued based on Reiche, the Examiner is respectfully requested to identify in Reiche the elements that teach or suggest each

element recited in the Claims by other than the general cites that have been used to date, i.e., by identifying what within the cited text of Reiche is considered to teach or suggest Applicants' claim language. Applicants respectfully request reconsideration and withdrawal of the obviousness rejection of Claim 1.

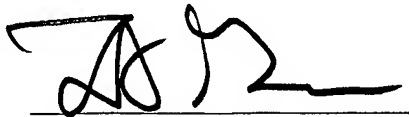
Applicants respectfully traverse the obviousness rejection of each of Claims 2, 3, 4, 5, and 6. With respect to Claims 2, 3, 4, 5, and 6, the above comments are incorporated herein by reference. Each of Claims 2, 3, 4, 5, and 6 recites at least one key to provide access to a resource on said data communications network; a resource identifier, a resource server peer group ID; and a randomized user ID. The cited sections of Reiche and the cited sections of Rode failed to teach the foregoing recited elements, as previously discussed.

A *prima facie* obviousness rejection has not been made. Applicants respectfully request reconsideration and withdrawal of the obviousness rejection of each of Claims 2, 3, 4, 5, and 6.

Claims 1 to 6 remain in the application. For the foregoing reasons, Applicants respectfully request allowance of all pending claims. If the Examiner has any questions relating to the above, the Examiner is respectfully requested to telephone the undersigned Attorney for Applicant(s).

CERTIFICATE OF MAILING

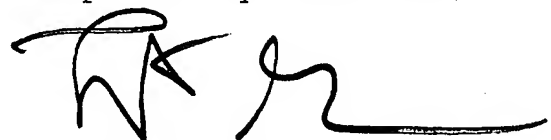
I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail in an envelope addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on June 8, 2006.



Attorney for Applicant(s)

June 8, 2006
Date of Signature

Respectfully submitted,



Forrest Gunnison
Attorney for Applicant(s)
Reg. No. 32,899
Tel.: (831) 655-0880